

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO. 1:17CR512
)
 Plaintiff) JUDGE CHRISTOPHER A. BOYKO
)
)
 vs.) MAGISTRATE JUDGE JONATHAN
)
) GREENBERG
)
)
HERBERT SHAW,) **MOTION FOR BOND**
)
)
 Defendant)

Now comes the Defendant, HERBERT SHAW, by and through his attorney, Michael H. Peterson, and respectfully moves this Court to grant the Defendant bond for the reasons contained in the attached memorandum.

Respectfully submitted,

/s/Michael H.Peterson
MICHAEL H. PETERSON (0010599)
Attorney for Defendant
820 West Superior Ave., Suite 800
Cleveland, Ohio 44113
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MEMORANDUM

The Defendant, Hebert Shaw who plead guilty to conspiracy on October 31, 2019 before Magistrate Judge Jonathan Greenberg and was referred to the United States Probation Department.

Pursuant to the Plea, it appears that the Defendant Offense Level pursuant to the Sentencing Guidelines would place him at Level 17, Criminal history 3 and between a Sentencing Range of 30-37 months.

The Defendant, Herbert Shaw has been incarcerated at Northeast Ohio, Correctional Center, 2240 Hubbard Road, Youngstown, Ohio 44505 for almost two (2) years. His sentencing date has been continued until February 20th 2020; which would mean the Defendant served his prison time.

Defendant is not a flight risk and is not danger to the community and has full family support.

WHEREFORE, Herbert Shaw respectfully requests that this Court would release him on Bond.

Respectfully submitted,

/s/ Michael H. Peterson +
MICHAEL H. PETERSON (0010599)
Attorney for Defendant
820 West Superior Ave., Suite 800
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CERTIFICATE OF SERVICE

A true copy of the foregoing Motion For Bond has been served by e-file U.S. Clerk of Courts and to the Assistant United States Attorneys Office, on this 6th day of November, 2019.

/s/ Michael H. Peterson
MICHAEL H. PETERSON (0010599)
Attorney for Defendant